



July 23, 2009

Jennifer J. Johnson, Secretary

Board of Governors of Federal Reserve System

20th Street Constitution Avenue, NW

Washington, DC 20551

Re: Section 106 of the Credit Card Accountability Responsibility and Disclosure Act of 2009

Dear Ms. Johnson:

Community Credit Union supports the intent of the **Credit Card Accountability Responsibility and Disclosure Act of 2009 (CARD Act)**, which is to eliminate predatory credit card practices. However, we are requesting open end lending multi-featured plans be exempt or at a minimum, extend the August 20, 2009 deadline to provide sufficient time to comply with the extensive changes required.

Community Credit Union is one of over 3,500 credit unions nationwide that utilize the credit union industries multi-featured, open-end lending programs. The multi-featured, open end lending programs have been allowed by the Federal Reserve Board for over a quarter of a century. This arrangement allows the member to conveniently access a variety of different types of open-end credit under a single plan, including loans for automobiles and other vehicles.

Our members, with open end multi featured plans, receive a monthly statement notifying them of their next payment due date. It is the practice of our credit union to be member friendly and set payment due dates to meet the budgeting needs of our members. Members receive their income at various times during the month and request their payment to coincide with their pay roll schedule, which may be monthly, bi-weekly, weekly or semi-monthly. This flexibility in due dates has allowed our members to be financially responsible and meet their debt payments.

The new 21-day payment notification requirement will require very significant and complicated operational changes and whether done by or after August 20th, sending separate statements will greatly increase both processing and mailing costs, with rough estimates of between \$1 - \$2.25 a month per loan, and there is no assurance that credit unions currently even have the capacity to print and mail this increased number of statements. Not only will credit unions need to pass on these costs to their members in the form of higher loan rates, lower deposit rates, or higher fees elsewhere, but credit union members will be very confused and concerned when they receive multiple statements from their credit union, depending on how many loans they have outstanding. Credit union relationships with their members will suffer, all in an effort to comply with a law that is intended to benefit consumers.

In a related matter, the Board has recently used its authority with regard to the Bankruptcy Abuse Prevention and Consumer Protection Act of 2005, which required disclosures on the front of each periodic statement in a prominent location that describe the effects of making minimum payments. However, in developing the rules that were issued last year to implement these requirements, the Board used its authority under Section 105(a) to limit these disclosures to credit cards by recognizing that these disclosures would not be useful or necessary for other types of open-end credit. The CARD Act contains

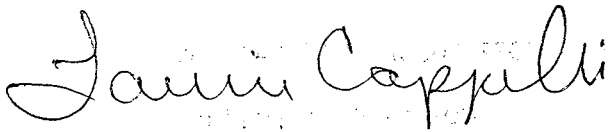
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similar provisions with regard to minimum payment warnings that would apply to all open-end credit and, again, urge the Board to use its authority to limit these disclosures to credit cards for similar reasons.

Thank you for the opportunity to raise these issues with regard to Section 106 of the CARD Act. If you want to discuss or meet with us with regard to these concerns, please contact me at 321-690-2328.

Sincerely,



Laurie Cappelli

SVP Lending

Community Credit Union

CC: Mary Dunn

c/o CUNA's Regulatory Advocacy Department

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